# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§	
JASON TAYLOR MARTIN,	§	
	§	
Debtor.	§	
	§	
	§	
	§	CASE NO. 22-42492-elm7
NATHAN PARK,	§	CHAPTER 7
Plaintiff,	§	
	§	
vs.	§	Adversary No. 23-04001-elm
	§	
JASON TAYLOR MARTIN,	§	
Defendant.	§	

# PLAINTIFF'S WITNESS AND EXHIBIT LISTS

#### TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Plaintiff Nathan Park files his Witness and Exhibit Lists in this matter.

# Witnesses

1. Nathan Park

c/o Scott Hayes

Waddell Serafino Geary Rechner Jenevein, P.C.

1717 Main Street, 25th Floor

Dallas, TX 75201

214-979-7400

Plaintiff; Aware of defamatory statements made by Martin and damages

2. Marcus Powell

321 Sweetleaf Drive

Royse City, TX 75189

903 513 7696

Aware of defamatory statements made by Martin as to Park

3. Kalyn Powell

321 Sweetleaf Drive

Royse City, TX 75189

903 513 7696

Aware of defamatory statements made by Martin as to Park

- 4. Christina Martin
  - c/o Jesse Melester
  - 250 Adriatic Parkway
  - McKinney Texas 75070
  - 214 302 0817

Aware of defamatory statements made by Martin about Park

- 5. Linda Dailey
  - Child Protective Services
  - 469-236-0317

Aware of defamatory statements made by Martin about Park

- 6. Jamie Johnson
  - 214 676 8300

Aware of defamatory statements made by Martin about Park

7. Scott Hayes (attorneys' fees)

# **Exhibits**

- 1. Affidavit of Marcus Powell
- 2. Attorney fess documents/statements (to be provided)

Respectfully submitted,

/s/ Richard G. Dafoe

Richard G. Dafoe

State Bar No. 05309500

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Scott E. Hayes

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WADDELL SERAFINO GEARY RECHNER

JENEVEIN P.C.

Comerica Bank Tower

1717 Main Street, 25<sup>th</sup> Floor

Dallas, Texas 75201-7341

214-979-7400 - Telephone

214-979-7402 - Facsimile

#### ATTORNEYS FOR NATHAN PARK

### **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been sent to Jason Martin on this 26<sup>th</sup> day of June 2023.

Via First Class Mail &

CMRRR: 9489 0090 0027 6403 2854 53

Jason Martin 1016 Sycamore Street Burleson, Texas 76028

/s/ Scott Hayes

**Scott Hayes** 

### **CAUSE NO. 90644**

NATHAN PARK,	§	IN THE DISTRICT COURT
	8	
Plaintiff,	Š	
	§	
V.	§	196 <sup>th</sup> JUDICIAL DISTRICT
	ş	
JASON MARTIN,	§	
	8	
Defendant.	§	HUNT COUNTY, TEXAS

### AFFIDAVIT OF MARCUS POWELL

county of Hunt

**BEFORE ME**, the undersigned authority, on this day personally appeared Marcus Powell, who being by me duly sworn, deposed and stated as follows:

- 1. "My name is Marcus Powell. I am over twenty-one (21) years of age, have never been convicted of a felony or crime involving moral turpitude, and am fully qualified to make this affidavit.
- "I have personal knowledge of all the facts recited herein, and those facts are true and correct.
- 3. "I am the owner of Powell Roofing and Construction. On or around October 10, 2021, I received a telephone call from Jason Martin. I know Mr. Martin and am familiar with his voice. My wife, Kalyn Powell, listened in on the conversation.
- 4. "In this call from Mr. Martin, I put it on speaker phone, and Mr. Martin told me that he was in fear of his life because Nathan Park had supposedly placed a deadly hit out on Mr. Martin's life. Mr. Martin then proceeded to tell me that Nathan Park was a murderer. I asked Mr. Martin why he thought that and his response was, "that crazy mother fucker killed his father-in-law in order to obtain his life insurance policy and savings".
- 5. "Mr. Martin then stated that is how Nathan Park had obtained his properties, as well as his lavish life style. I confirmed with Mr. Martin that we were talking about Shannon Park's father, and Mr. Martin's response was, "Yes, the sorry son of a bitch murdered his own father-in-law and had several other individuals killed over the past few years." I am aware that Shannon Park is married to Nathan Park.

P'SEXHIBIT

6. "I was extremely shocked. Mr. Martin then proceeded to tell me that I needed to stay away from Nathan Park and eliminate any business deals with Mr. Park.

FURTHER, AFFIANT SAITH NOT.

SIGNED this 18 day of January 2022.

MARCUS POWELL

BEFORE ME, DOWN DOWN. Notary Public in and for the State of Texas, on this 18 day of January 2022, personally appeared MARCUS POWELL, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same, that he had personal knowledge of the facts stated herein and that said facts were true and correct.

Notary Public in and for the State of Texas

